

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DISTRICT**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No. 4:16-CR-00157-AGF
	)	
MICHAEL H. LITZ,	)	
	)	
Defendant.	)	

**JOINT MOTION FOR EXTENSION OF TIME TO COMPLY WITH VARIOUS  
PRE-TRIAL FILING OBLIGATIONS**

COMES NOW, Carrie Costantin, Attorney for the United States Acting Under the Authority Conferred by 28 U.S.C. Section 515, and James E. Crowe, Jr., and Gilbert C. Sison, Assistant United States Attorneys, and defense counsel for Michael H. Litz, and move the Court for an extension of time to comply with various pre-trial filing obligations. In support of said motion, the parties state as follows:

1. Pursuant to the Court's Order dated December 18, 2017, the parties are required to submit motions in limine, 404(b) evidence and jury instructions ten (10) days prior to trial. Because the trial is scheduled to begin on January 22, 2018, the deadline for such submissions is January 12, 2018. (Doc. 160, p.2-3).

2. Also, pursuant to the same Order, the parties are required to submit proposed *voir dire* questions and exhibit lists seven (7) days prior to trial. (Doc. 160, p. 2). The due date for compliance is Tuesday, January 16, 2018, because Monday, January 15, 2018 is a holiday.

3. Based on the press of business for the government, an office move for defense counsel and recent court scheduling matters, the parties respectfully request a brief extension of

time to comply with the aforementioned pre-trial filing obligations. The parties respectfully request that such items be filed prior to the final pre-trial conference, which is currently scheduled for Wednesday, January 17, 2018 at 9:30 a.m. (Doc. 160, p. 1).

4. In further support of said motion, the parties represent to the court that no motions in limine will be filed. The Government also does not intend to rely on any 404(b) evidence in its case-in-chief. Thus, the only anticipated pre-trial filings will be jury instructions, proposed *voir dire* questions and exhibit lists.

WHEREFORE, the parties pray for the requested relief, and for such other and further relief that the Court deems just and proper.

Dated: January 12, 2018.

Respectfully submitted,

**CARRIE COSTANTIN**

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Authority Conferred by 28 U.S.C. Section 515

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***Attorneys for Defendant, Michael H. Litz***

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed under seal via the Court's ECF system on January 12, 2018, and a copy served via electronic mail on the following counsel of record:

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